Case 5:24-cv-00291-FB-ESC Document 1-1 Filed 03/21/24 Page 1 of 4

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CLERK. U.S DISTRICT CLERK WESTERN DISTRICT OF TEXAS BY REDUTY

WESTERN DIVISION

ZENAIDA ANN GONZALES

(Enter your full name)
Plaintiff(s)

SA24CA0291 FB

(Supplied by

(Supplied by Clerk's Office)

TARGET CORPORATION

(Enter full name of each Defendant)

Defendant(s)

COMPLAINT

- 1. Zenaida Ann Gonzales lives at 1138 Chalmers Avenue, San Antonio, Texas, 78211. She lives with family at this address. She is a resident of the State of Texas.
- 2. Target Corporation is located in Minnesota. The address of the corporate headquarters is 1000 Nicollet Mall, Minneapolis, Minnesota 55403. The business is located in the State of Minnesota.
- 3. Plaintiff and Defendant live in separate states. Defendant does business and has locations in Texas, but its main headquarters is located in Minneapolis Minnesota.
- 4. Zenaida Ann Gonzales had a Target credit card. Charges appeared on her credit card while she worked for a temporary company. She notified Target Corporation that these were false charges. Target sent a fraud form by postal mail. Zenaida Gonzales completed the form and faxed it. Target removed some of the charges but not all. Zenaida Gonzales submitted a second fraud form and has received no response since July 2023. Now, this charge is on her credit report and has caused Plaintiff to miss out on several temporary jobs due to her negative Target debt. Target refuses to remove the charges.
- 5. Zenaida Ann Gonzales applied for Habitat for Humanity and qualified. Her folder was sent to the construction department so she and her two minor children could start their 300 hundred hours of sweat equity. Plaintiff was informed on March 5, 2024 she no longer qualified due to this bad debt. Plaintiff went to Target to made the payment. Now Plaintiff will have to restart the application process which takes several months all over again. Plaintiff paid for these fraudulent charges in the hopes she could continue in the Habitat for Humanity program.

Plaintiff Zenaida Gonzales wants her \$623.48 reimbursed by cashier check. Plaintiff wants Defendant to notify Equifax, Experian and Transunion that this is not bad debt. It was fraudulent charges and should have never been on Zenaida Gonzales's credit report. Plaintiff wants Defendant to reimburse the Court for all court costs due to having to file this suit.

Signature

Zenaida Ann Gonzales 1138 Chalmers Avenue San Antonio, Texas, 78211 210-389-6797



SW Military Drive - 210-977-8552 2810 SW Military Dr San Antonio, Texas 78224-1032 03/05/2024 06:01 PM

PAYMENT ON ACCOUNT

TARGET MASTERCARD ACCT# *8991 MASTERCARD

\$623.48

SUBTOTAL TOTAL

\$623.48 \$623.48

CASH PAYMENT \$625.00

CHANGE DUE \$1.52

REC# POA-4065-0771-0124-4111





RedCard Ending in: 8991

Account Identification Number: 00070380327

ZENAIDA A GONZALES

Summary of Account Activity	
Previous Balance	\$529.09
Payments and Other Credits	-\$0.00
Purchases and Other Debits	+\$0.00
Cash Advances	+\$0.00
Past Due Amount	\$529.09
Fees Charged	+\$41.00
Interest Charged	+\$12.39
New Balance	\$582.48
Total Credit Limit	\$0.00
Cash Limit	\$0.00
Available Credit	\$0.00
Portion Available for Cash	\$0.00
The Cash Limit is a portion of the Total Credit Limit	
Statement Closing Date	7/6/2023
Days in Billing Cycle	30

Statement Closing Date: July 6, 2023 Page 1 of 2

Payment Information	,
New Balance	\$582.48
Minimum Payment Due	\$582.48
Payment Due Date	8/3/2023
Late Payment Warning: If we do not rece payment by the date listed above, you may \$41,00 late fee.	
If you would like information, about credit c	ounseling services,

For questions, an address change or to report a lost or stolen card, go online or call us:

Manage My RedCard Target.com/myRedCard 1-800-424-6888 1-800-347-5842 **Target Card Services** TDD/TDY 1-612-815-9922 (Call Collect) Outside the U.S.

Calling will not preserve your billing-error rights

call 1-800-991-8433.

Important Messages

Account Serjously Past Due

If we don't set up payment arrangements for your RedCard soon, we may charge off your account and report it to the credit bureaus as bad debt. There's still time to work with us to try to find a solution for your account, but we need to hear from you right away. Give us a call at 888-608-7627 or go to Target.com/myRedCard.

> NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION INCLUDE THIS PORTION WITH YOUR PAYMENT MADE PAYABLE TO TARGET CARD SERVICES



NEW PHONE, HOME OR E-MAIL ADDRESS? PLEASE UPDATE ON REVERSE SIDE.

OFFICE COPY

P.O. BOX 660170 DALLAS TX 75266-0170 ինլիկիկնուլիկափոկակիկիկիկիկիկիկիկիկիկ

TARGET CARD SERVICES

Account Number Ending in Account Identification Number New Balance Minimum Payment Due Payment Due Date

> Amount Enclosed

8991 00070380327 \$582.48 \$582.48 Abgust 3, 2023

ZENAIDA A GONZALES 1138 CHALMERS AVE SAN ANTONIO TX 78211-1614